IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

ALICIA STREET, et al.,)	
Plaintiff,)	
v.)	Cause No. 4:19-CV-02590-CDP
LT. COL. LAWRENCE O'TOOLE, et al.,)	
Defendants.)	

CONSENT MOTION FOR EXTENSION TO FILE MOTION FOR FINAL APPROVAL

With consent of Defendants, Plaintiffs move the Court to extend Plaintiffs' deadline to file a. motion for Final Approval of Class Certification. In support of this motion, Plaintiffs state as follows:

- 1. On February 6, 2023, this Court granted Plaintiffs' Motion for Preliminary Approval of the Class Settlement. ECF No. 106.
- 2. That Order set the deadline for Plaintiffs to final their Motion for Final Approval of the settlement by May 23, 2023. Id. at 11.
- 3. Since that time, counsel for both parties have worked with the Claims Administrator to serve notice on all class members.
- 4. Class Counsel has nearly completed its preparation of the Final Approval filings; however, Class Counsel requires two days to resolve several minor issues that arose at the last moment before filing.
- 5. Plaintiffs, by consent of Defendants, request an extension of two days, to May 25, 2023, by which to file their Motion for Final Approval of the Class Settlement.

WHEREFORE, Plaintiffs respectfully request that the Court extend the deadlines for two days, up to and including May 25, 2023, to file their Motion for Final Approval of the Class Settlement.

Date: May 23, 2023 Respectfully submitted,

KHAZAELI WYRSCH LLC

/s/ John M. Waldron,
Javad M. Khazaeli, 53735MO
James R. Wyrsch, 53197MO
John M. Waldron, 70401MO
911 Washington Avenue, Suite 211
St. Louis, MO 63101
(314) 288-0777
(314) 400-7701 (fax)
javad.khazaeli@kwlawstl.com
james.wyrsch@kwlawstl.com
jack.waldron@kwlawstl.com

Attorneys for Plaintiff